



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Clifford A. Schulman, Treasurer  
Greenberg, Traurig, Hoffman, Lipoff,  
Rosen & Quentel, P A Political Action  
Committee  
1221 Brickell Avenue  
Miami, FL 33121

SEP 20 2000

Identification Number: C00266585

Reference: July Monthly Report (6/01/00-6/30/00)

Dear Mr. Schulman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

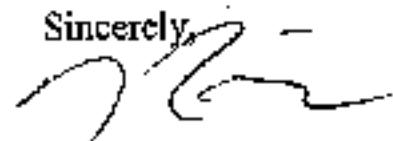
-Line 23 of the Detailed Summary Page of your report discloses a total of \$21,500 in contributions to federal candidates/committees and other political committees. The sum of the entries itemized on Schedule B, however, indicates the total to be \$20,500. Please amend your report to clarify the discrepancy.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our

toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Neil A. Evans  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

### SCHEDULE A ITEMIZED RECEIPTS

#### Distributions from Individuals

All information listed from Receipts and Payments may not be used or relied upon by any person for the purpose of reporting contributions or expenditures when the item uses the name and address of the committee contributor to whom contributions were made.

#### NAME OF COMMITTEE OR PAC

National Organization PAC 000000001

#### A. Full Name, Mailing Address and ZIP Code

Anne Belliveau  
21 Main Street  
City, State ZIP

#### Name of Donor

National Organization, Inc.  
payroll deduction  
\$72.00

#### B. Name, Mailing Address and ZIP Code

Anthony Jones  
881 Estuary Road  
City, State ZIP

#### Name of Donor

National Organization, Inc.  
payroll deduction  
\$120.00

#### C. Name, Mailing Address and ZIP Code

Frank President  
881 Estuary Road  
City, State ZIP

#### Name of Donor

Frank President  
payroll deduction  
\$120.00

Line itemizes deductions  
in full category in the  
General Schedule Page  
PAGE OF  
FOR LINE NUMBER  
11(a)(1)

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$192 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See item A in the illustration above.)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## IN-KIND CONTRIBUTIONS

### SCHEDULE A ITEMIZED RECEIPTS

#### Distributions from Individuals

All information listed from Receipts and Payments may not be used or relied upon by any person for the purpose of reporting contributions or expenditures when the item uses the name and address of the committee contributor to whom contributions were made.

#### NAME OF COMMITTEE OR PAC

National Organization PAC 000000001

#### A. Full Name, Mailing Address and ZIP Code

Martin L. Kraus  
4 River Road  
City, State ZIP

#### Name of Donor

National Organization, Inc.  
8/19/92 \$3,999.00  
(IN-KIND)  
RAFFLE  
PRIZE

Line itemizes deductions  
in full category in the  
General Schedule Page  
PAGE OF  
FOR LINE NUMBER  
11(a)(1)

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

### Appreciated Goods

When a committee receives an in-kind contribution whose value may

### SCHEDULE B ITEMIZED EXPENDITURES

#### Operating Expenditures/Other Federal

All information listed from Receipts and Payments may not be used or relied upon by any person for the purpose of reporting contributions or expenditures when the item uses the name and address of the committee contributor to whom contributions were made.

#### NAME OF COMMITTEE OR PAC

National Organization PAC 000000001

#### A. Full Name, Mailing Address and ZIP Code

Martin L. Kraus  
4 River Road  
City, State ZIP

Line itemizes deductions  
in full category in the  
General Schedule Page  
PAGE OF  
FOR LINE NUMBER  
21(b)

Prize price  
8/19/92 \$3,999.00  
(IN-KIND CONTRIBUTION)

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

